

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

LULA WILLIAMS, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:17-cv-461 (REP)
)	
BIG PICTURE LOANS, LLC, <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT MARTORELLO’S MOTION FOR LEAVE
TO FILE A SUR-REPLY IN OPPOSITION TO
PLAINTIFFS’ MOTION TO COMPEL INFORMATION
WITHHELD ON THE BASIS OF ATTORNEY-CLIENT PRIVILEGE**

Defendant Matt Martorello (“Martorello”), by counsel, pursuant to Local Rule 7(F)(1), hereby seeks leave of Court to file a Sur-Reply in Opposition to Plaintiffs’ Motion to Compel Information Withheld on the Basis of Attorney-Client Privilege (Dkt. No. 340). The grounds for this motion are set forth in the accompanying Memorandum of Law.

WHEREFORE, Martorello respectfully requests that the Court grant this Motion and for such other and further relief as the Court deems appropriate.

Respectfully submitted,

MATT MARTORELLO

By: /s/ M. F. Connell Mullins, Jr.
M. F. Connell Mullins, Jr. (VSB No. 47213)
Email: cmullins@spottsfain.com
Hugh McCoy Fain, III (VSB No. 26494)
Email: hfain@spottsfain.com
John Michael Erbach (VSB No. 76695)
Email: jerbach@spottsfain.com
Spotts Fain PC
411 East Franklin Street, Suite 600
Richmond, Virginia 23219

(804) 697-2000 (Telephone)
(804) 697-2100 (Facsimile)

Michael C. Witsch (admitted *pro hac vice*)
Jonathan P. Boughrum (admitted *pro hac vice*)
Richard L. Scheff (admitted *pro hac vice*)
ARMSTRONG TEASDALE, LLP
1500 Market Street
12th Floor, East Tower
Philadelphia, PA 19102
Telephone: 215.246.3479
Facsimile: 215.569.8228
Email: mwitsch@armstrongteasdale.com
Email: jboughrum@armstrongteasdale.com
Email: rscheff@armstrongteasdale.com

Michelle Lynne Alamo (admitted *pro hac vice*)
ARMSTRONG TEASDALE, LLP
4643 S. Ulster Street, Suite 800
Denver, CO 80237
Telephone: 720.722.7189
Facsimile: 720.200.0679
Email: malamo@armstrongteasdale.com

Paul Louis Brusati (admitted *pro hac vice*)
Tod Daniel Stephens (admitted *pro hac vice*)
ARMSTRONG TEASDALE, LLP
7700 Forsyth Blvd., Suite 1800
St. Louis, MO 63105
Telephone: 314.552.6602
Facsimile: 314.613.8522
Email: pbrusati@armstrongteasdale.com
Email: tstephens@armstrongteasdale.com

Counsel for Defendant Matt Martorello

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd of April, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to all counsel of record.

By: /s/ M. F. Connell Mullins, Jr.
M. F. Connell Mullins, Jr. (VSB No. 47213)
Email: cmullins@spottsfain.com
Spotts Fain PC
411 East Franklin Street, Suite 600
Richmond, Virginia 23219
(804) 697-2000 (Telephone)
(804) 697-2100 (Facsimile)

Counsel for Defendant Matt Martorello